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12 **UNITED STATES DISTRICT COURT**

13 **DISTRICT OF NEVADA**

14 THE SOUTHERN NEVADA OPERATING) Case No. 2:17-cv-00115-JCM-PAL
15 AND MAINTENANCE ENGINEERS)
16 APPRENTICESHIP AND TRAINING TRUST)
17 FUND, by and through its designated fiduciary)
Tom O'Mahar)

Plaintiff,)

vs.)

BRADY LINEN SERVICES, LLC, a Nevada)
limited liability company,)

Defendant.)

STIPULATION AND REQUEST FOR
EXTENSION OF TIME FOR
DEFENDANT TO RESPOND TO
PLAINTIFF'S COMPLAINT

(First Request)

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19 Plaintiff The Southern Nevada Operating and Maintenance Engineers Apprenticeship and
20 Training Trust Fund (“JATC”) and Defendant Brady Linen Services, LLC (“Brady”), by and
21 through their respective counsel of record, stipulate and request that the Court extend the
22 deadline for Defendant’s response to Plaintiff’s Complaint from the current deadline of February
23 3, 2017, up to and including March 6, 2017. In support of this Stipulation and Request, the
24 parties state as follows:

25 1. Defendant was served with the Summons and Complaint (ECF No. 1) in this
26 matter on January 13, 2017, rendering its response to the Complaint due by February 3, 2017.
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2. Counsel for Defendant has represented Defendant in multiple charges filed with the National Labor Relations Board (“NLRB”) pertaining to the issues described in Plaintiff’s Complaint. Accordingly, Defendant’s counsel has provided the information that it provided to the NLRB to Plaintiff’s counsel for his review. The parties believe that such review is necessary to allow the parties to consider an alternative resolution to this case.

3. Counsel for both parties have conferred regarding this request for an extension of time and both parties agree to the extension.

4. This is the first request for an extension of time in this matter and is being brought in good faith and is not sought for any improper purpose or other purpose of delay.

WHEREFORE, the parties respectfully that the Court extend the deadline for Defendant to respond to Plaintiff's Complaint, up to and including March 6, 2017.

DATED this 3rd day of February, 2017.

CHRISTENSEN JAMES & MARTIN

KAMER ZUCKER ABBOTT

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Attorneys for Plaintiff

Attorneys for Defendant

ORDER

IT IS SO ORDERED.

DATE: February 3, 2017

Terry A. Teer
UNITED STATES MAGISTRATE JUDGE